

TIMOTHY M. BURGESS
United States Attorney

STEPHAN A. COLLINS
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Tel: (907) 271-5071
Fax: (907) 271-1500
E-mail: stephan.collins@usdoj.gov
AK # 8911061

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No. 3:05-cr-108-11 (JWS)
)	
Plaintiff,)	
)	RESPONSE TO MOTION
vs.)	
)	
ISAI HERNANDEZ,)	
)	
Defendant.)	
)	
)	

Isai Hernandez, the defendant, moves to have the United States produce a copy of video and audio recordings in which he appears and is overheard. The United States has previously made available the audiotapes in which Hernandez is believed to have been overheard. Furthermore, the United States agrees to make

available for copying the videotapes in which Hernandez is interested to him as well as the other defendants.

RESPECTFULLY SUBMITTED this day, January 13, 2006, in
Anchorage, Alaska.

TIMOTHY M. BURGESS
United States Attorney

s/Stephan A. Collins
Assistant U.S. Attorney
222 West 7th Ave., #9, Rm. 253
Anchorage, AK 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
E-mail: stephan.collins@usdoj.gov
AK # 8911061

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2006
a copy of the foregoing was served
electronically:

Raul Mendez, Esq.
(Counsel for ▲ Isai Hernandez)
P.O. Box 12028
Mill Creek, WA 98082
(206) 284-0849
(425) 316-6707

T. Burke Wonnell
(Counsel for ▲ D'Andre Tolbert)
2600 Denali St., Ste. 460
Anchorage, AK 99503
Tele: 276-8008
Fax: 278-8571

Lance C. Wells
(Counsel for ▲ Krista Callan)
733 West 4th, Suite 308
Anchorage, AK 99501
Fax: (907) 277-9859

D. Scott Dattan
(Counsel for ▲ Shannon Rainey)
2600 Denali St., Suite 460
Anchorage, AK 99503
Fax: 907-278-8571

Michael Dieni
(Counsel for ▲ Richard McKinnon)
Federal Public Defender Agency
550 W. 7th Ave., #1600
Anchorage, AK 99501
Fax: (907) 646-3480

John C. Pharr
(Counsel for ▲ Alexander Booker)
733 W. 4th Ave., Suite 308
Anchorage, AK 99501
Fax: (907) 277-9859

via FAX:

William B. Carey
(Counsel for ▲ Carlos Rainey)
Carey Law Office
1502 W. 34th Avenue
Anchorage, AK 99503
Fax: (907) 272-4256

Scott Sterling, Esq.
(Counsel for ▲ Joshua Pluid)
851 E. Westpoint Drive Suite 201
Wasilla, AK 99654
Tele: 376-8076
Fax: 376-8078

Mark A. Rosenbaum
(Counsel for ▲ Damon Stevens)
4940 Byrd Lane, Ste. 100
Anchorage, AK 99502
Fax: (907) 243-2609

s/ Stephan A. Collins